

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Pomega Energy Storage Technologies, Inc.)	Civil Action No.: 2:24-cv-03205-BHH
and Kontrolmatik Technologies, Inc.,)	
)	
Plaintiffs,)	
)	PLAINTIFFS' ANSWERS TO LOCAL
v.)	RULE 26.01 INTERROGATORIES
)	
Jones Lang LaSalle Americas, Inc.,)	
)	
Defendant.)	
)	

Plaintiffs Pomega Energy Storage Technologies, Inc. and Kontrolmatik Technologies, Inc. provide the following answers to the Local Rule 26.01 Interrogatories:

1. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER:

None.

2. As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER:

Plaintiffs' Complaint requests a jury trial on all issues so triable.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

Plaintiffs Pomega Energy Storage Technologies, Inc. and Kontrolmatik Technologies, Inc. are not publicly owned. Kontrolmatik Technologies, Inc. is a wholly owned subsidiary of Kontrolmatik Teknoloji Enerji ve Mühendislik A.Ş. (“Kontrolmatik Turkey”), a publicly owned Turkish corporation. Kontrolmatik Turkey owns 50% of the shares of Pomega Energy Storage Technologies, Inc. Pomega Energy Storage Technologies, Inc. and Kontrolmatik Technologies, Inc. are not the parents of any publicly owned company. Pomega Energy Storage Technologies, Inc. and Kontrolmatik Technologies, Inc. do not own 10% or more of the outstanding shares of any publicly owned company.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER:

On May 28, 2024, this case was removed from the Court of Common Pleas of Colleton County, South Carolina, which is in the District of South Carolina, Charleston Division.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

Plaintiffs are not aware of any related matters.

6. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

Not applicable.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER:

Not applicable.

8. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER:

Plaintiffs Pomega Energy Storage Technologies, Inc. and Kontrolmatik Technologies, Inc. are corporations organized under the laws of Delaware with principal places of business in Virginia.

SMITH ROBINSON, LLC

s/ Jonathan M. Robinson

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